## COPY

# BEFORE THE BOARD OF MEDICAL EXAMINERS OF THE STATE OF NEVADA

### **COMPLAINT**

The Investigative Committee of the Nevada State Board of Medical Examiners, composed of Charles N. Held, M.D., Chairman, Jean Stoess, M.A., Member, and Benjamin J. Rodriguez, M.D., Member, at the time of the authorization of filing this formal complaint, by and through Edward O. Cousineau, counsel for the Investigative Committee, having a reasonable basis to believe that Phillip Lisagor, M.D., hereinafter referred to as "Respondent," has violated the provisions of NRS Chapter 630, hereby issues its formal Complaint, stating the Investigative Committee's charges and allegations, as follows:

- 1. Respondent was licensed to practice medicine in the state of Nevada on or about August 4, 1984. Respondent's license to practice medicine is currently active, and at all times alleged herein, Respondent was licensed in active status by the Nevada State Board of Medical Examiners, pursuant to the provisions of Chapter 630 of the Nevada Revised Statutes.
- 2. On or about March 21, 2008, while serving on active-military-duty and deployed to Southwest Asia, Respondent was issued an Article 15, or non-judicial punishment, under the Uniform Code of Military Justice in relation to previous events which brought Respondent's professional military conduct into question. At the time of the issuance of the Article 15, Respondent was afforded the opportunity to accept the disciplinary decision of the issuing body or to demand a trial by court martial.

!	3.	Thereafter, Respondent waived his right to trial by court martial, and on or about
April	18, 2	008, non-judicial punishment was imposed upon Respondent, the content of the
punishment included forfeiture of pay by Respondent.		
	4.	Section 630.301(3) of the Nevada Revised Statutes provides that any disciplinary

- 4. Section 630.301(3) of the Nevada Revised Statutes provides that any disciplinary action taken by a branch of the Armed Services of the United States is grounds for discipline.
- 5. The non-judicial punishment imposed upon Respondent by the Armed Services of the United States constitutes a violation of the provisions of NRS 630.301(3).
- 6. Based upon the forgoing, Respondent has violated Nevada Revised Statutes 630.301(3) and is subject to discipline by the Nevada State Board of Medical Examiners as provided in Nevada Revised Statute 630.352.

### WHEREFORE, the Investigative Committee prays:

- 1. That the Board fix a time and place for a formal hearing;
- 2. That the Board give Respondent notice of the charges herein against him, the time and place set for the hearing, and the possible sanctions against him;
- 3. That the Board determine what sanctions it determines to impose for the violation or violations committed by Respondent; and
- 4. That the Board make, issue and serve on Respondent its findings of facts, conclusions of law and order, in writing, that includes the sanctions imposed.

DATED this 23 day of April, 2009.

INVESTIGATIVE COMMITTEE OF THE NEVADA STATE BOARD OF MEDICAL EXAMINERS

By:

Edward O. Cousineau

Attorney for the Investigative Committee of the Nevada State Board of Medical Examiners

# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 1105 Terminal Way #301

### VERIFICATION

STATE OF NEVADA
COUNTY OF DOUGLAS
Charles N. Held, N
of perjury that he is the C
Medical Examiners that a
he foregoing Complaint
nvestigation into a compl
he foregoing Complaint a
DATED this $23^{\circ}$

SS.

M.D., having been duly sworn, hereby deposes and states under penalty Chairman of the Investigative Committee of the Nevada State Board of uthorized the Complaint against the Respondent herein; that he has read ; and that based upon information discovered in the course of the aint against Respondent, he believes that the allegations and charges in gainst Respondent are true, accurate, and correct.

day of April, 2009.

Charles N. Held, M.D.

# OFFICE OF THE GENERAL COUNSEL Nevada State Board of Medical Examiners 1105 Terminal Way #301 Reno, Nevada 89502

**CERTIFICATE OF MAILING** 

I hereby certify that I am employed by Nevada State Board of Medical Examiners and that on the 23<sup>rd</sup> day of April 2009, I served a file copy of the COMPLAINT, NOTICE OF PREHEARING & HEARING, a copy of the appointment letter and FINGERPRINTING INFORMATION, by mailing via USPS certified return receipt to the following:

Phillip Lisagor, M.D. 3250 Mario Rd. Reno, NV 89523

Dated this 23<sup>rd</sup> day of April 2009.

Angelia Donohoe Legal Assistant